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August 18, 2020

Application GRANTED. The Initial Pretrial Conference previously set for September 8, 2020 is ADJOURNED to December 14, 2020 at 2:00 p.m. It will proceed telephonically. The parties are directed to call (888) 251-2909 and use access code 2123101.

The Honorable Lewis J. Liman
United States District Judge
Southern District of New York
500 Pearl Street
New York, NY 10007

8/19/2020



LEWIS J. LIMAN
United States District Judge

**Re: *Elite Union Installations, LLC v. National Fire Insurance Company of Hartford*,
No. 20-cv-04761 (LJL)**

Dear Judge Liman:

This firm represents Plaintiff Elite Union Installations, LLC in the above-captioned action.

Pursuant to the Waiver of Service filed by Plaintiff on August 18, 2020 and Federal Rule of Civil Procedure 12(a), Defendant National Fire Insurance Company of Hartford's deadline to answer, move, or otherwise respond to the Complaint is October 13, 2020.¹

In light of this new deadline for Defendant's response to the Complaint, we write, with the consent of Defendant, to request an adjournment of the Initial Pretrial Conference, which is currently scheduled for September 8, 2020, and of the deadline for the parties to submit a Case Management Plan and Scheduling Order, which is currently September 1, 2020. There have been no previous requests for adjournment or extensions of time in this action.

¹ Under Rule 12(a), Defendant's deadline to respond to the Complaint is 60 days after the request for a waiver of service was sent. The waiver of service was sent to Defendant on August 11, 2020. Sixty days from August 11, 2020 is October 10, 2020, which is a Saturday, and October 12, 2020 is a federal holiday (Columbus Day).



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Pursuant to Section 4.A of the Court's Individual Practices in Civil Cases, the parties propose the following three alternative dates for the Initial Pretrial Conference: December 14, 15, or 16.

Respectfully submitted,

/s/ Kenneth J. Grunfeld

Kenneth J. Grunfeld, Esq.

Richard M. Golomb, Esq.

GOLOMB & HONIK, P.C.

Cc: Counsel of Record (by ECF)